

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

In Re: )  
JANE LOUISE HUDSON ) Case Number 6:16-bk-02004-KSJ  
 ) Chapter 7  
Debtors. )  
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\_\_\_\_\_  
\_\_\_\_\_  
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APPLICATION TO EMPLOY SPECIAL COUNSEL

The Application of Lori Patton, as trustee in the above estate, respectfully represents:

1. The Applicant is the duly appointed and qualified trustee in the above proceeding, having been so appointed pursuant to Section 701 of the Bankruptcy Code [11 U.S.C. Section 701(a)].
2. The Applicant wishes to employ Andrea L. Pate and her firm, Pates Law Group, PA (collectively “Pates Law Group, PA”) as special counsel pursuant to F.R.B.P. 2014 which is made applicable to the above proceeding under the Bankruptcy Code by Section 405(d) of the Bankruptcy Reform Act of 1978 (Pub. L. 95-598).
3. The Applicant wishes to hire Pates Law Group, PA for the purpose of representing the estate in the debtor’s divorce proceeding.
4. The trustee proposes to hire Pates Law Group, PA for the reason that it has considerable experience in matters of this character and believe that Pates Law Group, PA is well qualified to represent the trustee in this proceeding.
5. Ms. Pate has indicated her willingness to act on the applicant's behalf. Pates Law Group, PA agrees to act on behalf of the trustee at the rate of \$275.00 per hour.
6. The trustee believes that Pates Law Group, PA represents no interest adverse to the debtor or the estate in the matters upon which it is to be engaged for the trustee, and its employment would be in the best interest of the estate.

Under penalty of perjury, I have read the foregoing Application and it is true and correct to the best of my knowledge information and belief.

I HEREBY CERTIFY that a true and correct copy of the foregoing and the Declaration Of Proposed Attorney, copy attached, have been furnished via Electronic Notice or First-Class United States Mail, postage prepaid this 9th day of November, 2016 to Jane Louise Hudson, 204 RAMBLEWOOD DRIVE, SANFORD, FL 32773; Timothy L Dave, PO Box 951535, Lake Mary, FL 32795; and the Office of the United States Trustee, George C. Young Federal Courthouse, 400 West Washington Street, Suite 1100, Orlando, FL 32801.

Dated November 9, 2016.

/s/ Lori Patton  
Lori Patton, Trustee  
Po Box 520547  
Longwood, Fl 32752  
Telephone: (407) 937-0936  
Telefax: (407) 937-2236  
Email: trustee@trusteepatton.com

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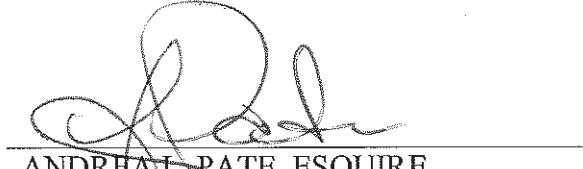
DECLARATION OF PROPOSED ATTORNEY

Andrea L. Pate and Pates Law Group, PA submits the following statement in support of the Application To Employ Special Counsel in compliance with 11 U.S.C. §328(a) and §329(a) and F.R.B.P. 2014 and 2016.

1. I am an attorney admitted to practice law in the State of Florida.
2. I maintain my office at 1521 Mt. Vernon St., Orlando, FL 32803.
3. I am not a relative of the debtor.
4. I do not presently represent any creditors, any party to an executory contract of the debtor, or any person otherwise adverse or potentially adverse to the debtor or estate, on any matter, whether such representation is related or unrelated to the debtor or the estate.
5. I have not previously represented a creditor, party to an executory contract, or a person otherwise adverse or potentially adverse to the debtor or the estate, on any matter, substantially related to the bankruptcy case.
6. There is no agreement of any nature to the sharing of any compensation for services performed and to be performed in this case.
7. I have no connection with the debtor, other than I formerly represented the debtor in the same divorce matter.
8. I have no interest direct or indirect, which may be affected by the proposed representation.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this date, November 9, 2016.



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ANDREA L. RATE, ESQUIRE  
Florida Bar No. 26989  
Pates Law Group, P.A.  
1521 Mt. Vernon St.  
Orlando, FL 32803  
407-896-1166  
Andrea@pateslaw.com